

STEVEN A. SILNUTZER, P.C.  
335 E. Jimmie Leeds Road  
Bldg. 200, Suite C  
Galloway, NJ 08205  
(609) 748-6100  
Attorney for Debtor:  
Steven A. Silnutzer, Esq.

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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In RE:	)	Case No. 14-20604 (ABA)
MERCADO, Hector J.	)	Chapter 13
Debtor	)	NOTICE OF MOTION TO ENTER INTO LOSS MITIGATION PROGRAM
	)	

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Notice to:

Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38, Suite 580 Cherry Hill, NJ 08002	Nationstar Mortgage c/o Stern Lavinthal & Frankenberg, LLC Attn: Ashley Rose, Esq. 105 Eisenhower Parkway Suite 302 Roseland, NJ 07068	Nationstar Mortgage c/o Shapiro & DeNardo, LLC Attn: Charles Wohlrab, Esq. 14000 Commerce Parkway Suite B Mount Laurel, NJ 08054
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TAKE NOTICE that the Debtor, Hector J. Mercado, through his attorney, Steven A. Silnutzer, shall move before the U.S. Bankruptcy Court, 401 Market Street, Camden, New Jersey 08101, on the 3rd day of October 2017 at 10:00am, seeking an order allowing the debtor to enter into the Bankruptcy Loss Mitigation Program on the following grounds: Mr. Mercado is interested in applying for a loan modification that would allow him to retain his home.

The Debtors shall rely on the attached certifications and arguments of counsel. No brief is necessary as the issues herein are straight forward. Oral argument is requested.

Please note that should you object to the relief requested in this motion, that you must serve your written objection no later than seven (7) days prior to the hearing date to the United States Bankruptcy Court, 401 Market Street, 2<sup>nd</sup> Floor, PO Box 2067, Camden, NJ 08101, and serve a copy to my office as well.

**STEVEN A. SILNUTZER, P.C.**

Dated: September 11, 2017

/s/ Steven A. Silnutzer, Esq.